

Ronald W. Del Sesto, Jr.
Direct Phone: 202.373.6023
Direct Fax: 202.373.6001
r.delsesto@bingham.com

March 1, 2012

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, DC 20554

**Re: Tata Communications (America) Inc. - Filer ID: 823568
CPNI Compliance Certification
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Tata Communications (America) Inc. ("TCA"), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's 2011 CPNI compliance certification.

Please direct any questions regarding this submission to the undersigned.

Very truly yours,

/s/ Ronald W. Del Sesto, Jr.

Ronald W. Del Sesto, Jr.

Enclosure

cc: Best Copy and Printing, Inc. (via E-Mail)

Boston
Hartford
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Los Angeles
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Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Walnut Creek
Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T 202.373.6000
F 202.373.6001
bingham.com

Tata Communications (America) Inc.
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year (2011)

Date filed: March 1, 2012

Name of company covered by this certification: Tata Communications (America) Inc.

Form 499 Filer ID: 823568

Name of Signatory: David Ryan

Title of signatory: Executive Vice President

I, David Ryan, certify that I am an officer of the company named above ("TCA"), and acting as an agent of TCA, that I have personal knowledge that TCA has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

TCA has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at state commissions, the court system, or at the Commission) against data brokers in the past year.

TCA has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

TCA represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. TCA also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  David Ryan, Executive Vice President
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Attachment: Accompanying Statement explaining CPNI procedures

Tata Communications (America) Inc.
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Accompanying Statement

Tata Communications (America) Inc. ("TCA") is primarily an international carrier serving other carriers, Internet service providers and large enterprise customers. TCA typically transports the "middle" segment only of circuit-switched voice or Voice over Internet Protocol ("VoIP") international calls. TCA interconnects with U.S. interexchange carriers at the carrier hotel level (above the access tandem level) where traffic is handed off to TCA by its carrier customers, and then TCA transports that traffic to another interexchange carrier, usually overseas, for ultimate termination. TCA also transports traffic, handed off to TCA overseas by foreign carriers, into the U.S. Once the traffic is in the U.S., TCA hands off the traffic to a U.S. interexchange carrier (typically a U.S. carrier that, unlike TCA, is interconnected with local exchange carriers) for termination. TCA provides a wide range of international information and voice and data telecommunications services to enterprise customers by means of direct access arrangements connecting such customers with TCA's network. TCA also offers an international calling card service to end-user customers, which represents a fraction of one percent of TCA's total revenue.

TCA never uses CPNI in outbound marketing campaigns. Typically, new customers come to TCA, shopping for the best price for their international voice termination requirements. TCA first signs a nondisclosure agreement with the prospective carrier-customer and then markets to them using our price list for traffic termination destinations served. Any enterprise or wholesale voice transport carrier prospects that TCA contacts (*i.e.*, that do not contact us first) are identified through public sources such as industry magazines. TCA attracts new customers for its international calling card service by advertising at community events and on select television channels, through Internet banners and search engine keywords, by placing print ads in select publications (for a short period of time, it experimented with using a third party telemarketing vendor to acquire new customers, but no longer does so and TCA did not share CPNI with this third party telemarketing vendor). The only instance in which TCA may initiate contact with the customer using CPNI is for billing, maintenance and repair purposes, and to inquire about the customer's satisfaction with its existing services. Since TCA never uses CPNI in outbound marketing campaigns it does not collect opt-in authorizations from customers for such use.

Furthermore, TCA does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties for the purposes of marketing any services. The provision of CPNI to any unrelated third party is strictly prohibited except for billing purposes, for the provision, maintenance and repair of services, to protect rights or property of TCA, or pursuant to legal process.

TCA is committed to protecting the confidentiality of all customer information, including CPNI. TCA has implemented password protection for customer access to account information. TCA's customer contracts contain confidentiality requirements regarding the treatment of customer account information, including CPNI, and TCA employees are prohibited from disclosing such

information. All TCA personnel have certified in writing that they have read and will adhere to the Code of Conduct ("Code"), which contains strict confidentiality requirements for all customer confidential information, including CPNI, and provides for disciplinary action for violation up to, and including, immediate termination of employment. In fact, as part of an overall program of legal compliance training for TCA employees, TCA has instituted a web-based training program that trains employees on a variety of legal compliance matters, including training related to the Code. Additionally, at the time of hiring, all new personnel must sign an agreement on Confidential Information, Intellectual Property and Exclusivity Undertakings, which includes confidentiality requirements such as maintaining the confidentiality of customer information. TCA personnel who are authorized to access CPNI are trained in the authorized uses of this information.

TCA is prepared to comply with applicable breach notification laws in the event of a CPNI breach.